

INFORMATIONAL WORKSHOP

Proposed Amendments to
Waste Discharge Requirements
for Disposal/Reuse of Contaminated Soils
and Other Nonhazardous Wastes
at Municipal Solid Waste Landfills

Los Angeles Regional Water Quality Control Board
October 6, 2010

Goals

- To amend WDRs for active MSW landfills to clarify requirements for the disposal and reuse of contaminated soils and related wastes.
- To update requirements for the protection of surface water quality for landfills that reuse contaminated soils or related wastes.

Background

- Order No. 91-93 (General WDRs for contaminated soil disposal) is ineffective
- There is no policy / procedure for on-site reuse of contaminated soils or wastes
- Surface water quality monitoring is limited

Limitation of Order No. 91-93

- Issued to soil generators, not landfill operators
- Specifically for petroleum contaminated soils, though other wastes are allowed
- Disposal limits have not been updated (TPH:1,000 mg/kg)

No policy / procedure for on-site reuse of contaminated soils or related wastes

- Requests for contaminated soils reuse are increasing
- Title 27 CCR§ 20690 – Alternative Daily Cover
 - **Green waste,**
 - **Sludge and sludge-derived materials,**
 - **Ash and cement kiln dust materials,**
 - **Treated auto shredder waste,**
 - **Contaminated dredge spoils,**
 - Foundry sands,
 - **Energy resource exploration and production wastes,**
 - Compost materials,
 - Processed construction and demolition wastes and materials,
 - Shredded tires, Spray applied cementitious products

Current surface water regulation

- Active MSW landfills are subject to requirements of the General Industrial Stormwater Permit
- Minimum requirements
 - Two stormwater sampling events
 - Benchmarks for five parameters (pH, TSS, SC, OG/TOC, Fe)

Considered WDR Amendments

- Revised acceptance limits for petroleum hydrocarbon contaminated soils
- Include limits for other contaminants of concern
- Implement waste acceptance methodology to prevent disposal of designated wastes
- Implement waste reuse criteria
- Expand requirements of the general Industrial Stormwater Permit **or** require a site-specific or regional general NPDES permit

Contaminated Soil Acceptance Limits

- Establish threshold contamination levels (“clean” soils, no disposal or reuse restriction)
- Establish general acceptance limits for all landfills (contaminated soils, subject to BMPs)
- Require site-specific analyses for accepting wastes above the general acceptance limits to exclude designated wastes

Petroleum Hydrocarbons

- Threshold limits: TRPH:500*; TPHd:10; TPHg:10
- Disposal acceptance limits
 - Unlined: TRPH:10,000; TPHd:1,000; TPHg:500
 - Lined: TRPH:50,000; TPHd:10,000; TPHg:1,000
- Onsite reuse acceptance limits
 - TRPH:10,000; TPHd:100; TPHg:100

*All units are mg/kg or parts per million

Other Pollutants: VOCs, SVOCs, Pesticides, PCBs, metals, etc.

- Threshold limits: No exceedance of a industrial PRG or CHHSL
- Disposal acceptance limits
 - Unlined: Not to exceed 100 X MCL
 - Lined: Not to exceed 100 X MCL or site-specific designated waste limit, whichever is higher
- Onsite reuse acceptance limits
 - Not to exceed 100 X MCL or SCAQMD Rule 1150.1 limits, whichever is lower

Surface Water Protection

- General Industrial Stormwater Permit
 - Expand use of BMPs to limit surface water runoff from active disposal areas
 - Increase sampling to every storm events
 - Increase parameters to be monitored (VOCs, SVOCs, Pesticides, PCBs, CAM metals, etc.)
- Site Specific or regional general NPDES Permit
 - Develop site specific stormwater requirements, including effluent limits

Tentative Schedule

- Informational workshop - October 6, 2010
- Tentative order released for comments - November 15, 2010
- Public comment period - November 15, 2010 to January 3, 2011
- Public workshop - December 1, 2010 (as necessary)
- Board meeting hearing - February 2011